

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

HOPE A. THOMAS,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-20-444-G
)	
CSAA INSURANCE SERVICES, INC.,)	
)	
Defendant.)	

OPPOSED MOTION TO ENLARGE THE SCHEDULING ORDER DEADLINES

Plaintiff Hope Thomas (“Plaintiff”), hereby respectfully submit this Motion to Enlarge the Scheduling Order Deadlines, requesting a sixty (60) day extension of all remaining Scheduling Order deadlines. In support of this Motion, the Plaintiff states as follows:

1. On October 7, 2020, the Court entered its original Scheduling Order, [Doc.18] setting the following deadlines:

<u>Description</u>	<u>Current Deadline</u>
Join/Amend	10/21/2020
Plaintiff's Final Expert List and Reports	04/20/2021
Plaintiff’s Final Witness and Exhibit List	05/05/2021
Defendant's Final Expert List and Reports	05/11/2021
Defendant's Final Witness and Exhibit List	05/19/2021
Dispositive and Daubert Motion deadline	06/01/2021
Discovery to be completed	07/01/2021
Designations of deposition testimony to be used at trial	08/16/2021
MIL, VD, TB, JI and FPTR	08/16/2021
Objections and counter-designations	08/23/2021
Objections to counter-designations	08/30/2021
Jury Trial	09/14/2021

2. The Parties have continued to diligently and in good faith to work through the discovery phase; they are currently engaged in written discovery;
3. The Plaintiff's mother is terminally ill and the Plaintiff is having to deal the emotional distress of this situation along with the other responsibilities which will arise in assisting the management of the estate. Plaintiff has advised that she is not physically or emotionally capable of performing the tasks (depositions and gathering materials for discovery) that are presently required.
4. To allow for Plaintiff to deal with the current situation, she has requested that the present deadlines be enlarged by sixty (60) days and the Defendant has objected to this request.
5. No other enlargements have been requested and no further enlargements are contemplated.
6. This Motion will affect all remaining deadlines; and,
7. The Plaintiff respectfully request that the remaining Scheduling Order Deadlines in this case be extended by an additional sixty (60) days as set forth below:

<u>Description</u>	<u>Proposed Deadline</u>
Join/Amend	12/21/2020
Plaintiff's Final Expert List and Reports	06/21/2021
Plaintiff's Final Witness and Exhibit List	07/05/2021
Defendant's Final Expert List and Reports	07/12/2021
Defendant's Final Witness and Exhibit List	07/19/2021
Dispositive and Daubert Motion deadline	08/02/2021
Discovery to be completed	08/30/2021
Designations of deposition testimony to be used at trial	10/15/2021
MIL, VD, TB, JI and FPTR	10/15/2021
Objections and counter-designations	10/22/2021

Objections to counter-designations	10/29/2021
Jury Trial	TBD by the Court

*All dates falling on a Saturday or Sunday have been moved to the following Monday.

WHEREFORE, the Plaintiff respectfully request the Court to extend the deadlines an the trial setting in this matter by sixty (60) days. A proposed order will be submitted via email for the Court's consideration.

RESPECTFULLY SUBMITTED THIS 20th DAY OF OCTOBER 2020.

s/Mark Hammons

HAMMONS, HURST & ASSOC.

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

A true copy of the foregoing instrument was filed and served via this Court's ECF system of filing and service on this 20th day of October, 2020 upon Defendant's counsel below listed:

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